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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, SANDHYA LAMA, TEOFILO
MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**NOTICE RE: PLAINTIFFS' MOTION TO
CONSIDER EXTRA RECORD EVIDENCE
[DKT. 153]**

Judge Trina Thompson

1 Additional Counsel for Plaintiffs

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1 Plaintiffs' motion to consider extra record evidence requests that the Court consider three
 2 categories of extra-record evidence submitted in support of Plaintiffs' motion for partial summary
 3 judgment. Dkt. 153 at 1-2 (describing categories). During yesterday's hearing, the Court requested
 4 that Plaintiffs clarify which exhibits fall into which categories. In response, Plaintiffs respectfully
 5 provide the following chart:

Category	Motion Exhibit [Dkt. 145-1]	Reply Exhibit [Dkt. 176-1]
Public statements of Secretary Noem, President Trump, and the Department of Homeland Security.	1, 2, 3, 4, 5, 11, 12, 13, 14	
Deliberative documents regarding decisionmaking for the challenged agency actions, and other TPS terminations during this administration.	15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 47, 48, 49, 53, 54, 55	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
Deliberative documents and explanatory testimony related to other TPS decisions prior to the current administration.	46, 50, 51, 52	

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 22 The above chart includes all the exhibits submitted in support of Plaintiffs' motion for
 23 partial summary judgment with the exception of Motion Exhibits 6-10, filed at Dkt. 145-7 through
 24 145-11, which consist of State Department travel advisories that may be properly subject to judicial
 25 notice. *See, e.g., Petersen v. Boeing Co.*, 715 F.3d 276, 281 (9th Cir. 2013) (taking judicial notice of
 26 State Department travel advisory).

1 Date: November 19, 2025

2 Respectfully submitted,

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4 ACLU FOUNDATION
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6 /s/ Emilou MacLean
7 Emilou MacLean

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28 *Attorneys for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on November 19, 2025, I caused the foregoing to be electronically filed
3 with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing
4 (NEF) to all counsel of record.

5 ACLU FOUNDATION
6 OF NORTHERN CALIFORNIA

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